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17 *(additional counsel listed on signature page)*

18 UNITED STATES DISTRICT COURT

19 SOUTHERN DISTRICT OF CALIFORNIA

20 JOANNE FARRELL, on behalf of
21 herself and all others similarly situated,

22 Plaintiff,

23 vs.

24 BANK OF AMERICA, N.A.,

25 Defendant.

CASE NO. 3:16-cv-00492-L-WVG

26 **NOTICE OF MOTION AND
27 PLAINTIFF'S UNOPPOSED
28 MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT AND FOR
CERTIFICATION OF
SETTLEMENT CLASS**

Judge: Hon. M. James Lorenz

Place: Courtroom 5B

Hearing Date: December 11, 2017

**NO ORAL ARGUMENT UNLESS
REQUESTED BY COURT**

1 TO DEFENDANT AND COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on December 11, 2017, in the United States
3 District Court for the Southern District of California, located at 221 West Broadway,
4 San Diego, California, Courtroom 5B, before the Honorable M. James Lorenz,
5 Plaintiff, Joanne Farrell, will respectfully move for Preliminary Approval of the
6 Settlement Agreement and Release, attached as *Exhibit A* to Plaintiff's Memorandum
7 of Points and Authorities, which will resolve all claims against Bank of America,
8 N.A. in the above-captioned action.

9 This Motion is based on this Notice of Motion and Motion, the accompanying
10 Memorandum of Points and Authorities, the Joint Declaration of Class Counsel and
11 the exhibits thereto, the pleadings and other papers filed in this action, and such other
12 written and oral argument as may be allowed or presented to the Court.

13
14 Dated: October 31, 2017

Respectfully submitted,

15 /s/ Jeffrey Kaliel
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